

**Staff Report
for**

***Item 13
Discussion
October 29, 2002***

**To: John H. Robertus
Executive Officer**

**From: Paul J. Richter
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Industrial Compliance Unit**

**U.S. Navy, Naval Base San Diego
tentative Order No. R9-2002-0169
NPDES Permit No. CA0109169**

The U.S. Navy installations in the San Diego area fall under the *U.S. Navy, Commander, Navy Region Southwest* (CNRSW) command structure and are aligned into three (3) major complexes:

1. *Naval Base Point Loma,*
2. *Naval Base San Diego, and*
3. *Naval Base Coronado.*

A separate NPDES permit will be developed for each complex. Tentative Order No. R9-2002-0169 will regulate the discharges from the installations included as part of the *Naval Base San Diego* (NBSD) Complex and is the second NPDES permit for the three Naval Complexes. The Regional Board adopted an Order for the *Naval Base Point Loma* (NBPL) at its September 11, 2002 meeting. The tentative Order for the NBSD contains discharge requirements similar to those in the Order adopted for the NBPL.

The NBSD Complex includes the Navy installations listed below:

1. Naval Station, San Diego (NAVSTA);
2. Mission Gorge Recreational Facility (MGRF);
3. Broadway Complex; and
4. Naval Medical Center, San Diego (NMCSD).

Point Source

The NBSD has various point source discharges and industrial storm water discharges. The *point source* discharges at NBSD are grouped into six general industrial processes:

1. Utility Vault & Manhole Dewatering;
2. Steam Condensate;
3. Salt Water System Discharge;
4. Pier Boom, Mooring, and Fender System Cleaning; and
5. Miscellaneous Discharges (landscape watering runoff, potable water & fire system maintenance).
6. Ship repair and maintenance activities.

Descriptions of the point source discharges are included in the Fact Sheet for the tentative Order. The point source discharges are intermittent or low volume discharges with a low potential threat to water quality. The tentative Order requires monitoring to ensure that the potential threat to water quality is low.

Industrial Storm Water

Industrial storm water discharges occur at three of the four *Installations* at the NBSD, and these facilities are covered by Water Quality Order No. 97-03-DWQ (General Industrial Storm Water Permit). The installations are listed below.

1. Naval Station, San Diego (NAVSTA);
2. Broadway Complex;
3. Naval Medical Center, San Diego (NMCSD).

Provided in the Fact Sheet are the following: a summary of the industrial activities; a brief description of the Navy's storm water working group; a discussion of the USEPA Multi-Sector permit; and a description of certain storm water monitoring analysis data.

The industrial storm water discharges from the NAVSTA have significant levels of copper and zinc. The tentative Order requires the industrial storm water discharges from the NAVSTA to comply with toxicity specifications within four years of the adoption of the tentative Order. The toxicity limit is a performance goal prior to the toxicity specification being required. During the four-year period before the effective date of the toxicity limit, the U.S. Navy shall conduct a study of the toxicity in storm water discharges from all areas of NAVSTA at which industrial activities are undertaken. The Navy shall recommend a scientifically valid survival rate for acute exposure to discharges of storm water from industrial areas at NAVSTA.

The tentative Order requires additional monitoring of the industrial storm water discharges if the concentrations of copper exceed 63 µg/L or if the zinc concentrations exceed 117 µg/L. The Navy is allowed time to modify and implement changes to its Storm Water Pollution Prevention Plan (SWPPP) prior to resampling.

Hull Coating Leachate, Underwater Husbandry, and Radioactivity

The regulation and monitoring of hull coating leachate, and underwater ship husbandry do not need to be included in the tentative Order. Hull coating leachate and underwater ship husbandry

will be regulated pursuant to the *Uniform National Discharge Standards for Vessels of the Armed Forces* (UNDS).

Pursuant to the Federal *Atomic Energy Act*, the Regional Board does not have jurisdictional authority to regulate the discharges of radioactive wastes. The Navy and the Department of Energy have jurisdiction for discharges of radioactive material. The Navy has a quarterly monitoring program for radioactive discharges. The USEPA has also conducted a separate, one-time monitoring program for radioactivity. This Order, therefore, does not regulate discharges of radioactive wastes from Naval vessels or from nuclear support facilities.

A memorandum by Paul J. Richter, Associate Water Resource Control Engineer, dated July 22, 2002 was written regarding hull coat leachate, underwater ship husbandry, and radioactive discharges. The memorandum identifies the regulatory processes for discharges of hull coating leachate, underwater ship husbandry, and the monitoring processes and oversight of radioactive discharges being conducted by the Navy and USEPA. The memorandum is included with the Fact Sheet in the agenda package.

The tentative Order provides protection of water quality equivalent to the protection provided by the General NPDES permits for the shipyards along San Diego Bay. The tentative Order implements similar requirements that were adopted for the Naval Base Point Loma permit. The following requirements are included in the tentative Order:

1. The industrial storm water toxicity requirement allows the Naval Station (NAVSTA) four-years to achieve compliance with the 90% survival 50% of the time limit.
2. During the four-year period before the effective date of the toxicity limit the U.S. Navy shall conduct a study of the toxicity in storm water discharges from all areas of NAVSTA at which industrial activities are undertaken and shall recommend a scientifically valid survival rate for acute exposure to discharges of storm water from industrial areas at NAVSTA. The study may include a Toxicity Identification Evaluation (TIE), or a Toxicity Reduction Evaluation (TRE).
3. Industrial storm water discharge requirements are incorporated into the tentative Order. The requirement to resample the industrial storm water discharges upon finding high levels of copper or zinc allows the Navy time to adjust its best management practices (BMP) and storm water pollution prevention plan (SWPPP) prior to resampling the industrial storm water discharge. The tentative Order requires quarterly submittal of monitoring data when high concentrations of copper or zinc are found.
4. The tentative Order requires the NAVSTA to terminate the first 1/4-inch of industrial storm water discharges from high-risk areas no later than two years after the adoption of the Order. The requirement to terminate the first 1/4-inch of runoff from the high-risk areas is the same requirements for the commercial shipyards in the San Diego Bay.
5. Utility vault discharge requirements are incorporated into the tentative Order.

Availability of the tentative Order

The tentative Order was mailed on October 3, 2002, 41 days prior to today's meeting.

Comment letters

As of October 29, 2002 staff has not received any comment letters for the tentative Order.